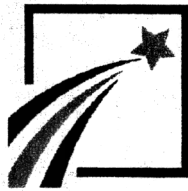


AD6-0013



***National
Environmental
Achievement Track***

Application Form

Novartis Crop Protection, Inc.

Name of facility

Novartis Crop Protection, Inc.

Name of parent company (if any)

3905 Hwy 75

Street address

4200 Geigy Access Road

Street address (continued)

St. Gabriel, LA 70776

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Karen Williams

Title Director of Health, Safety, Ecology, Quality

Phone (225)642-1100

Fax (225)642-1794

E-mail karen.williams@cp.novartis.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Triazine herbicide manufacturing with organic intermediates, other organic agricultural chemical manufacturing, chelating chemical manufacturing, agricultural chemical formulations, and limited specialty chemical manufacturing. We also package and formulate the products we manufacture.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

2879 2819 2869

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

LAD053783445

LA0005487 (NPDES)

100-LA-001 (FIFRA)

70776BGGYRIVER (EPCRA)

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

Checklist enclosed.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

-OSHA VPP Star Site since 1993

-Major resident contractor JEMerit is OSHA Star

-Only chemical manufacturing facility participating in USEPA's Environmental Leadership Program (ELP)

-Recipient of Louisiana ELP Governor's award for release reduction program in 1999

-Certified Wildlife Habitat Council site since 1997

-High level of employee involvement

-Several awards in management and leadership (WEC gold medal, Novartis foundation "School to Work" program, Plant Engineering "Peak" award)

On December 2, 1999, the Boards of Novartis and Astra Zeneca PLC announced that they unanimously agreed to spin off, on a worldwide basis, the Novartis agribusiness and the Zeneca agrochemicals business and to then merge those two businesses into a new stand-alone entity. On or about November 13, 2000, the combination of these businesses, subject to pending regulatory approvals, will form Syngenta AG, which will have its world wide headquarters in Basel, Switzerland. At the same time, in the United States, the respective United States crop protection businesses of Novartis Crop Protection, Inc. and Zeneca Ag Products, Inc., will be transferred to and become subsidiaries of the Syngenta U.S. holding company, which will be owned by Syngenta AG. On or about January 1, 2001, Zeneca Ag Products, Inc. will merge into Novartis Crop Protection, Inc., with Novartis Crop Protection, Inc. continuing as the surviving corporate entity. At that time, Novartis Crop Protection, inc. will change its name to Syngenta Crop Protection, Inc. The Zeneca Agribusiness site in St. Gabriel, Louisiana is adjacent to the Novartis Crop Protection St. Gabriel site and in January 2001, the two sites may be considered one site.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes Health, Safety & Environmental Policy 10/97
St. Gabriel Plant Procedure L1

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes Corporate Audit November 1998

☐ Self-assessment

If yes, what method of EMS assessment did you use?

☐ GEMI ☒ Other

☐ CEMP

☐ Third-party assessment

☐ ISO 14001 Certification

☒ Other

As part of EPA's Environmental Leadership Program (Pilot Phase) our EMS was compared to other EMS systems such as GEMI AND ISO 14000. The conclusion of the EPA team was that the St. Gabriel EMS is comprehensive and covers all the elements that are included in the other systems.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Release History	Ten reportable quantity (RQ) releases	Number of releases and spill frequency.	Seven RQ's including three CERCLA RQ's.	Number of releases and spill frequency.
	including five CERCLA RQ's. Site frequency 0.655		Site frequency 0.597	

- i. How is the current level an improvement over the previous level?

Novartis's St. Gabriel Site defines a release in a very different way from a reportable release. Novartis's definition of a release clearly goes beyond the regulatory definition. Novartis defines a release as any discernable release, including those that may be caught in secondary containment (with the exception of uncontaminated water, unless the event provides learning opportunities for others.) The focus on releases and their causes, even tiny ones, reduces the likelihood of a large release, thereby reducing environmental risk. Both reportable quantity releases and site tracked releases have been reduced during the past two years.

ii. How did you achieve this improvement?

Section C, continued

Site uses participative management teams and various communication efforts. This includes specific management focus on release performance, a spill prevention committee, annual goal setting, release prevention programs and awareness campaigns. Additional measures used are, computerized release reporting and site wide communication and distribution of release reports to aid in prevention, implementation of "Spill Prevention Tours", failed gasket inspection program and galvanized bolt implementation program.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total solid waste (TFMP production)	1.5 pounds liquid organic waste per pound of product.	Ratio of pounds of waste to pounds of TFMP product.	0.53 pounds of liquid organic waste per pound of product.	Ratio of pounds of waste to pounds of TFMP product.
<p>i. How is the current level an improvement over the previous level?</p> <p>Decrease in TFMP intermediate organic liquid waste produced per pound of product produced.</p> <p>ii. How did you achieve this improvement?</p> <p>Process improvement in product solvent waste recycling. Solvent is purified using a distillation column and reused.</p>				

Third aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?	What is the current level?
Energy	25,514 KW Kilowatts of electrical demand	20,249 KW Kilowatts of electrical demand.
<p>i. How is the current level an improvement over the previous level?</p> <p>Reduction in kilowatts of electrical demand from utilities during summer shutdown period (August 1998 and August 2000). This coincides with peak electrical demand in this area. Our site is in an ozone non-attainment area. Reducing electrical use during this peak contributes to reduced ozone formation.</p> <p>ii. How did you achieve this improvement?</p> <p>Site demand was lowered due to a restructuring of summer shutdown period. Area goals were established. Electrical demand was monitored and reduced during the peak period to keep demand low.</p>		

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Release History

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

☐ Option B:
In terms of
units of production
or output

Seven reportable
quantities (RQ)
including three CERCLA
RQ's. Total release
frequency of 0.6
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

Five reportable quantity
(RQ) per year and total
release frequency of 0.5

(Quantity/Units)

(Quantity/Units)

e. How will you achieve this improvement?

Participative management teams, spill prevention
tours, internal goals, employee awareness
campaigns and other spill prevention programs.

Second aspect you've selected

a. What is the aspect?

Water Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

Demin water
1.04 gal/lb. tech equil.
(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

Process water
3.884 gal/lb. tech equil.
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

1% reduction
(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

6 – 7 million gallons
(Quantity/Units)

e. How will you achieve this improvement?

This will be a continuation of a program we started in 1997. Reductions have been made by reducing seal flush flow and improve operability. Decreased water usage in safety showers and freeze protection measures, employee awareness campaigns, improved monitoring of water usage and water conservation programs. This one percent reduction represents 2 – 3 million gallons per year

Third aspect you've selected

- a. What is the aspect? Hazardous materials use – PBT's
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 5144 lbs on site generated PBT's
600 lbs as trace impurity in raw materials
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of units of production or output | |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 5% per year on site generated PBT's |
| <input type="checkbox"/> Option B:
In terms of units of production or output | < 300 lbs as trace impurity in raw materials
(Quantity/Units) |
- (Quantity/Units)
- e. How will you achieve this improvement?
- Process changes to eliminate presence of PBT's in site raw materials. Elimination of chloroform as a solvent used in the analysis of final products. Monitor materials purchased for the presence of PBT and eliminate where possible.
-

Fourth aspect you've selected

a. What is the aspect?

Discharges of toxics to water

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 694.5 lbs. Atrazine, 134.4 lbs. of Simazine and 114,026 lbs. TOC in NPDES Discharge.
(Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 10% reduction per year.
(Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Early implementation of carbon adsorption (PEG filters) in wastewater treatment plant. These absorbers will be placed in service before required by our NPDES permit to reduce Atrazine and Simazine loading to the river. Other parameters currently monitored as part of our NPDES permit will also be reduced, which will likely not be required by our new permit.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Community meetings, CAP, Annual Community Survey, Participation on Community Boards (i.e., Healthy Communities, Iberville chamber, Iberville Sustainable Community Strategic Planning, Iberville CAER, LEPC), Coordinators for our parish Odor Response Team.

Novartis also has an "Open Door Policy" with community residents.

2 How do you inform community members of important matters that affect them?

CAP, Annual Community Meetings, Annual Community Door-to-Door campaign to promote awareness of Emergency Response procedures, Quarterly Community Newsletter (Connections), Press Release to Local Media, Ads in Local Newspaper, Flyers in Local Businesses, Additional Mailings to all Boxholders as necessary, Ring Down System, Siren System, Cable Override, Work with Locals Schools (i.e., Safety Town, Summer Teachers Work Program), open door policy with community, site tours.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☐ Website
☐ Newspaper
☐ Open Houses
☒ Other

Put copy in local libraries.

Discuss with CAP.

Connections newsletter.

4 Are there any ongoing citizen suits against your facility?

☒ Yes ☐ No

If yes, describe briefly in the right-hand column.

Three lawsuits seeking class action certification were filed in July 2000, in the 18th Judicial District Court, Iberville Parish, Louisiana, against Novartis Crop Protection, Inc. The lawsuits stem from a release of ~125 pounds of ammonia which occurred at Novartis' St. Gabriel, Louisiana Plant on July 18, 1999. The plaintiffs seek to represent a class of individuals residing in St. Gabriel who claim injuries as a result of their alleged exposure to ammonia.

Novartis' position is that the lawsuits are totally without merit. The leak, which was the result of a gasket failure, was stopped in approximately 15 minutes and no ammonia vapors were detected in the community. All appropriate federal, state and local agencies were immediately notified as required by law and no action was taken against the company. Novartis intends to vigorously defend the lawsuits.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	CAP	Larry Rouse	225-642-8729
<i>State/Local Regulator</i>	LDEQ – Secretary	Dale Givens	225-765-0741
	LDEQ – Asst Secretary	Hall Bohlinger	225-765-0741
	LDEQ – Office of Secretary	Dr. Charles Killebrew	225-765-0741
<i>Other community/local reference</i>	Iberville Parish Emergency Coordinator	S. H. "Jackie" Jackson	225-687-5140

On behalf of Novartis Crop Protection, Inc.,

Section E

Application and Participation Statement.

I certify that

I have read and agree to the terms and conditions of the
Achievement Track Program Description and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Robert W. Slaven / *[Signature]*

Printed Name/Title Robert W. Slaven / Plant Manager

Facility Name Novartis Crop Protection, Inc.

Facility Street Address 3905 Hwy. 75, St. Gabriel, La 70776

Facility ID Numbers 1 000 0009 2614

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Novartis Crop Protection, Inc.
Facility Location: St. Gabriel, Louisiana
Facility ID Number(s): LAD053783445 (RCRA)
(attach additional sheets if necessary) LA0005487 (NPDES)
 100-LA-001 (FIFRA)
 70776CBGGYRIVER (EPCRA)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☐
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☒
4. Control of Incinerators ☒
5. Process Industry Emission Standards ☒
6. Control of Fuel Burning Equipment ☒
7. Control of VOCs ☒
8. Sampling, Testing and Reporting ☒
9. Visible Emissions Standards ☒
10. Control of Fugitive Dust ☐
11. Toxic Air Pollutants Control ☒
12. Vehicle Emissions Inspections and Testing ☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13. 40 CFR 60 New Source Performance Standard, ☒
40 CFR 63 MACT Standards
14. 40 CFR 82 Ozone Protection, ☒
Louisiana State Air Pollution Control Requirements LAC 33:III

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
- Characteristic Waste ☒

- Listed Waste ☒
- 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting ☒
 - Pre-transport requirements ☒
 - Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☒
 - Preparedness and prevention ☒
 - Contingency plan and emergency procedures ☒
 - Manifest system, Record keeping and reporting ☒
 - Groundwater protection ☒
 - Financial requirements ☒
 - Use and management of containers ☒
 - Tanks ☒
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☒
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☒

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. Louisiana State Hazardous Waste Regulations LAC 33:V ☒
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. Louisiana State Hazardous Materials reporting requirements LAC 33:V.10100, LAC 33:I.3900 ☒
- 7. ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐
4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. Louisiana State Solid Waste Regulations LAC 33:VII ☒
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☒
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☒
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☒
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☒
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. Louisiana State Water Pollution control regulations LAC 33:IX ☒
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☒

3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. Louisiana State Drinking Water regulations LAC 48. ☒
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☒
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☒
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☒
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☒
5. Labeling of Pesticides ☒
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☒
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☒

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. 40 CFR 167 Reporting requirements. Other requirements noted are applicable to the site as a manufacturer. Licensing and permit activities are administered through corporate offices. ☒

10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

☐☐

2. RCRA Corrective Action (identify)
Completed and satisfied all requirements to date.

☒☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3. Louisiana State administered activities

☒

4. ☐